

Exhibit 4

From: [Sarah Chen](#)
To: [Paikowsky, Dana \(CRT\)](#)
Cc: [Kathleen Hunker](#); [Patrick Sweeten](#); [Will Thompson](#); [Eric Hudson](#); [Jeff White](#); [Aaron Barnes](#); [Jack DiSorbo](#); [Zachary Berg](#); [Elizabeth Saunders](#); [Joshua Clarke](#); [SB12021](#); [Hani Mirza](#); [Chris Rainbolt](#); [Mimi Marziani](#); [Zachary Dolling](#); [Ashley Harris](#); [Thomas Buser-Clancy](#); [Savannah Kumar](#); [Jerry Vattamala](#); [Susana Lorenzo-Giguere](#); [Patrick Stegemoeller](#); [Lia Sifuentes Davis](#); [Marisol McNair](#); [Lucia Romano](#); [Lisa Snead](#); [Sophia LIn Lakin](#); [Adriel I. Cepeda Derieux](#); [Samantha Osaki](#); [Ari Savitzky](#); [Susan Mizner](#); [Amunson, Jessica Ring](#); [shirsch@jenner.com](#); [Mittal, Urja R.](#); [Trepp, Alex S.](#); [Cai, Sophia L.](#); [nperales](#); [wendy.olson@stoel.com](#); [gwhite@elias.law](#); [Stewart, Michael \(CRT\)](#); [liz.ryan@weil.com](#); [Keats, Michael](#); [chostetler@freespeechforpeople.org](#); [marc.rasich@stoel.com](#); [Sarah M. Cummings](#); [Shira Wakschlag](#); [elijah.watkins@stoel.com](#); [Dellheim, Richard \(CRT\)](#); [Freeman, Daniel \(CRT\)](#); [Liliana Zaragoza](#); [unkwonta@elias.law](#); [hessig@elias.law](#); [R. Gary Spencer](#); [Sean Morales-Doyle](#); [Patrick Berry](#); [Jasleen Singh](#); [William Wilder](#); [Eliza Sweren-Becker](#); [Victor Genecin](#); [cdodge@elias.law](#); [Georgina Yeomans](#)
Subject: Re: OCA-GH Witness Availability
Date: Thursday, May 12, 2022 11:00:41 PM

[Caution: EXTERNAL EMAIL]

Hi Kathleen,

As flagged by the DOJ, our previous list inadvertently listed witnesses that were disclosed to you prior to 4/18. Below is an updated list of available witnesses. Please let us know if you need to discuss.

Contact: Lia Sifuentes Davis, Lisa Snead, and Shira Wakschlag
 Joe Potts is available May 21-23. Joe is in Williamson County.
 Teri Saltzman is available May 20. Teri is in Travis County and requires the deposition to be remote.

Contact: Susana Lorenzo-Giguere and Jerry Vattamala

Witness Name	Location Availability	Availability	In-person or Remote?
Ming Fei Zhao	Austin	5/23 and 5/24 afternoon	In person at home
Yi Lu Zhao	Zoom	5/23 and 5/24 afternoon	Remote (92 years old, COVID fear/assisted)
Chanda Parbhoo	Dallas	5/24 12-4 5/25 12-4 5/26 10-2	In person
Riazuddin Ahmed	Zoom	5/23 - 5/26, 9 am – 11 am CT	Remote (91 years old, uses wheelchair/assisted)

Contact: Tommy Buser-Clancy, Ashley Harris, and Savannah Kumar

Janet Eickmeyer	Richardson, TX	Any day, preference for between	In-person or remote
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		10am-4pm CT.	
Jeannie Lewis		After May 17	Remote
Marian Alexander	Austin, TX	After May 15	In-person or remote
Judy Alter		Generally available	Remote
Susan Pantell		Generally available, preference for afternoon.	Remote
Cynthia Edmonson	Houston, TX	Available on the 16 th , 19 th , 20 th , and has availability week of the 23rd.	In-person or remote, but in-person needs to be wheelchair accessible and not downtown Houston.

Sarah Xiyi Chen

Pronouns: she/her

Attorney, Voting Rights Program

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On Thu, May 12, 2022 at 8:37 PM Paikowsky, Dana (CRT) <Dana.Paikowsky@usdoj.gov> wrote:

Our apologies Kathleen. There is a third witness listed below, Pam Gaskin, who was also disclosed in the United States' April 1, 2022 supplemental disclosures. We would similarly object to an out of time deposition of Ms. Gaskin. Please let us know if State Defendants would like to meet and confer.

Best,

Dana

From: Paikowsky, Dana (CRT) <>
Sent: Thursday, May 12, 2022 6:26 PM
To: Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Sarah Chen <schen@texascivilrightsproject.org>; Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Eric Hudson <Eric.Hudson@oag.texas.gov>; Jeff White <Jeff.White@oag.texas.gov>; Aaron Barnes <Aaron.Barnes@oag.texas.gov>; Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>; Joshua Clarke <Joshua.Clarke@oag.texas.gov>; SB12021 <SB12021@oag.texas.gov>
Cc: Hani Mirza <hani@texascivilrightsproject.org>; Chris Rainbolt <chris@texascivilrightsproject.org>; Mimi Marziani <mimi@texascivilrightsproject.org>; Zachary Dolling <zachary@texascivilrightsproject.org>; Ashley Harris <aharris@aclutx.org>; Thomas Buser-Clancy <tbuser-clancy@aclutx.org>; Savannah Kumar <skumar@aclutx.org>; Jerry Vattamala <jvattamala@aaldef.org>; Susana Lorenzo-Giguere <slorenzo-giguere@aaldef.org>; Patrick Stegemoeller <pstegemoeller@aaldef.org>; Lia Sifuentes Davis <ldavis@disabilityrightstx.org>; Marisol McNair <mmcnair@disabilityrightstx.org>; Lucia Romano <lromano@disabilityrightstx.org>; Lisa Snead <lsnead@disabilityrightstx.org>; Sophia Lakin <slakin@aclu.org>; Adriel I. Cepeda Derieux <ACepedaDerieux@aclu.org>; Samantha Osaki <sosaki@aclu.org>; Ari Savitzky <asavitzky@aclu.org>; Susan Mizner <smizner@aclu.org>; Amunson, Jessica Ring <JAmunson@jenner.com>; shirsch@jenner.com; Mittal, Urja R. <UMittal@jenner.com>; Trepp, Alex S. <atrepp@jenner.com>; Cai, Sophia L. <scai@jenner.com>; nperales <nperales@maldef.org>; wendy.olson@stoel.com; gwhite@elias.law; Stewart, Michael (CRT) <Michael.Stewart3@usdoj.gov>; liz.ryan@weil.com; Keats, Michael <michael.keats@friedfrank.com>; chostetler@freespeechforpeople.org; marc.rasich@stoel.com; Sarah M. Cummings <SCummings@reedsmith.com>; Shira Wakschlag <Wakschlag@thearc.org>; elijah.watkins@stoel.com; Dellheim, Richard (CRT) <Richard.Dellheim@usdoj.gov>; Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>; Liliana Zaragoza <lzaragoza@naacpldf.org>; unkwonta@elias.law; hessig@elias.law; R. Gary Spencer <gspencer@naacpldf.org>; Sean Morales-Doyle <morales-doyles@brennan.law.nyu.edu>; Patrick Berry <berryp@brennan.law.nyu.edu>; Jasleen Singh <singhj@brennan.law.nyu.edu>; William Wilder <wilderw@brennan.law.nyu.edu>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; Victor Genecin <vgenecin@naacpldf.org>; cdodge@elias.law; Georgina Yeomans <gyeomans@naacpldf.org>
Subject: RE: OCA-GH Witness Availability

Good evening Kathleen,

The United States disclosed two of the below witnesses—Amatullah Contractor and Hyunja Norman—in supplemental disclosures provided to State Defendants on April 1, 2022, which was more than six weeks before the close of discovery in this matter. The United States would object to an out time deposition for either witness. If you have any concerns, the United States would be happy to find a time to meet and confer.

Best,

Dana

Dana Paikowsky

Trial Attorney

Voting Section, Civil Rights Division

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Cc: Hani Mirza <hani@texascivilrightsproject.org>; Chris Rainbolt <chris@texascivilrightsproject.org>; Mimi Marziani <mimi@texascivilrightsproject.org>; Zachary Dolling <zachary@texascivilrightsproject.org>; Ashley Harris <aharris@aclutx.org>; Thomas Buser-Clancy <tbuser-clancy@aclutx.org>; Savannah Kumar <skumar@aclutx.org>; Jerry Vattamala <jvattamala@aaldef.org>; Susana Lorenzo-Giguere <slorenzo-giguere@aaldef.org>; Patrick Stegemoeller <pstegemoeller@aaldef.org>; Lia Sifuentes Davis <ldavis@disabilityrightstx.org>; Marisol McNair <mmcnair@disabilityrightstx.org>; Lucia Romano <lromano@disabilityrightstx.org>; Lisa Snead <lsnead@disabilityrightstx.org>; Sophia Lakin <slakin@aclu.org>; Adriel I. Cepeda Derieux <ACepedaDerieux@aclu.org>; Samantha Osaki <sosaki@aclu.org>; Ari Savitzky <asavitzky@aclu.org>; Susan Mizner <smizner@aclu.org>; Amunson, Jessica Ring <JAmunson@jenner.com>; shirsch@jenner.com; Mittal, Urja R. <UMittal@jenner.com>; Trepp, Alex S. <atrepp@jenner.com>; Cai, Sophia L. <scai@jenner.com>; nperales <nperales@maldef.org>; wendy.olson@stoel.com; gwhite@elias.law; Stewart, Michael (CRT) <Michael.Stewart3@usdoj.gov>; Paikowsky, Dana (CRT) <Dana.Paikowsky@usdoj.gov>; liz.ryan@weil.com; Keats, Michael <michael.keats@friedfrank.com>; chostetler@freespeechforpeople.org; marc.rasich@stoel.com; Sarah M. Cummings <SCummings@reedsmith.com>; Shira Wakschlag <Wakschlag@thearc.org>; elijah.watkins@stoel.com; Dellheim, Richard (CRT) <Richard.Dellheim@usdoj.gov>; Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>; Liliana Zaragoza <lzaragoza@naacpldf.org>; unkwonta@elias.law; hessig@elias.law; R. Gary Spencer <gspencer@naacpldf.org>; Sean Morales-Doyle <morales-doyles@brennan.law.nyu.edu>; Patrick Berry <berryp@brennan.law.nyu.edu>; Jasleen Singh <singhj@brennan.law.nyu.edu>; William Wilder <wilderw@brennan.law.nyu.edu>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; Victor Genecin <vgenecin@naacpldf.org>; cdodge@elias.law; Georgina Yeomans <gyeomans@naacpldf.org>
Subject: [EXTERNAL] RE: OCA-GH Witness Availability

Thank you, Sarah.

Let me consult with the other attorneys on my team about availability. I will get back to you with dates shortly.

Kathleen Hunker

Special Litigation Unit

Office of the Attorney General of Texas

209 W. 14th Street

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Cc: Hani Mirza <hani@texascivilrightsproject.org>; Chris Rainbolt <chris@texascivilrightsproject.org>; Mimi Marziani <mimi@texascivilrightsproject.org>; Zachary Dolling <zachary@texascivilrightsproject.org>; Ashley Harris <aharris@aclutx.org>; Thomas Buser-Clancy <tbuser-clancy@aclutx.org>; Savannah Kumar <skumar@aclutx.org>; Jerry Vattamala <jvattamala@aaldef.org>; Susana Lorenzo-Giguere <slorenzo-giguere@aaldef.org>; Patrick Stegemoeller <pstegemoeller@aaldef.org>; Lia Sifuentes Davis <ldavis@disabilityrightstx.org>; Marisol McNair <mmcnair@disabilityrightstx.org>; Lucia Romano <lromano@disabilityrightstx.org>; Lisa Snead <lsnead@disabilityrightstx.org>; Sophia Lakin <slakin@aclu.org>; Adriel I. Cepeda Derieux <ACepedaDerieux@aclu.org>; Samantha Osaki <sosaki@aclu.org>; Ari Savitzky <asavitzky@aclu.org>; Susan Mizner <smizner@aclu.org>; Amunson, Jessica Ring <JAmunson@jenner.com>; shirsch@jenner.com; Mittal, Urja R. <UMittal@jenner.com>; Trepp, Alex S. <atrepp@jenner.com>; Cai, Sophia L. <scai@jenner.com>; nperales <nperales@maldef.org>; wendy.olson@stoel.com; gwhite@elias.law; michael.stewart3@usdoj.gov; dana.paikowsky@usdoj.gov; liz.ryan@weil.com; Keats, Michael <michael.keats@friedfrank.com>; chostetler@freespeechforpeople.org; marc.rasich@stoel.com; Sarah M. Cummings <SCummings@reedsmith.com>; Shira Wakschlag <Wakschlag@thearc.org>; elijah.watkins@stoel.com; richard.dellheim@usdoj.gov; daniel.freeman@usdoj.gov; Liliana Zaragoza <lzaragoza@naacpldf.org>; unkwonta@elias.law; hessig@elias.law; R. Gary Spencer <gspencer@naacpldf.org>; Sean Morales-Doyle <morales-doyles@brennan.law.nyu.edu>; Patrick Berry <berryp@brennan.law.nyu.edu>; Jasleen Singh <singhj@brennan.law.nyu.edu>; William Wilder <wilderw@brennan.law.nyu.edu>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; Victor Genecin <vgenecin@naacpldf.org>; cdodge@elias.law; Georgina Yeomans <gyeomans@naacpldf.org>

Subject: OCA-GH Witness Availability

Hi Kathleen,

Here is our current understanding of the availability for deposition of individuals disclosed by the OCA-GH Plaintiffs prior to May 27, though some of this information may be subject to change. Please let me, Zach, and designated co-counsel know if you have any questions.

Contact: Lia Sifuentes Davis, Lisa Snead, and Shira Wakshlag

Joe Potts is available May 21-23. Joe is in Williamson County.

Teri Saltzman is available May 20. Teri is in Travis County and requires the deposition to be remote.

Contact: Susana Lorenzo-Giguere and Jerry Vattamala

Witness Name	Location Availability	Availability	In-person or Remote?
Amatullah Contractor	Houston	5/23 - 5/25, early as possible in the day	In person
Hyunja Norman	Houston	5/25 morning	In person
Ming Fei Zhao	Austin	5/23 and 5/24 afternoon	In person at home
Yi Lu Zhao	Zoom	5/23 and 5/24 afternoon	Remote (92 years old, COVID fear/assisted)
Rogene Gee Calvert	Zoom	5/23 after 3 pm CT 5/24 9:30 – 11:30 a.m. CT 5/25 anytime until 3 pm 5/26 anytime	Remote (health reasons, and over 70)
Chanda Parbhoo	Dallas	5/24 12-4 5/25 12-4 5/26 10-2	In person
Riazuddin Ahmed	Zoom	5/23 - 5/26, 9 am – 11 am CT	Remote (91 years old, uses wheelchair/assisted)

Contact: Tommy Buser-Clancy, Ashley Harris, and Savannah Kumar

Pam Gaskin	Missouri City, TX	Available May 17, 20, 24 or 27	In-person or remote
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Janet Eickmeyer	Richardson, TX	Any day, preference for between 10am-4pm CT.	In-person or remote
Jeannie Lewis		After May 17	Remote
Marian Alexander	Austin, TX	After May 15	In-person or remote
Judy Alter		Generally available	Remote
Susan Pantell		Generally available, preference for afternoon.	Remote
Cynthia Edmonson	Houston, TX	Available on the 16 th , 19 th , 20 th , and has availability week of the 23rd.	In-person or remote, but in-person needs to be wheelchair accessible and not downtown Houston.

Best,
Sarah

Sarah Xiyi Chen

Pronouns: she/her

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